



DELIVER *Quality & Delivery Support System*

Qwest Change Management Process Redesign Evaluation

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Version 3.0

Prepared for: Arizona Corporation Commission

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For further information call Professions and Service Lines - Global Delivery:

Phone: +33 (0)1 47 54 54 78

Fax: +33 (0)1 47 54 52 77

e-mail: pslgd@capgemini.fr

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1 INTRODUCTION AND PURPOSE

As part of the Qwest Arizona §271 OSS Test, the Arizona Corporation Commission (ACC) requested that CGE&Y conduct an evaluation of the redesign of Qwest's Change Management Process (CMP). CGE&Y had evaluated the predecessor to the CMP, called the "Co-Provider Industry Change Management Process" (CICMP), and reported on it in its Arizona §271 OSS Test Final Report. Qwest and the Competitive Local Exchange Carrier (CLEC) community began a collaborative redesign of the process while CGE&Y's Final Report was being drafted, and therefore the redesign process was only covered at a high level in that document.

This report presents CGE&Y's analysis of Qwest's efforts to redesign its change management process. The purpose of this document is to present the current state of the process, as redesigned, and the current state of the redesign process itself and present a background against which to judge the current process consisting of the following elements:

- Industry "Best Practices" in the area of Change Management as a discipline
- The Arizona §271 OSS Master Test Plan (MTP) and Test Standards Document (TSD)
- The Federal Communication Commission's (FCC) requirements for an adequate Change Management Process

Finally, this report presents a list of priority CLEC issues related to the CMP redesign process and CGE&Y's analysis of where these issues fall with respect to the FCC requirements and various State Orders where §271 approval has already been granted to the incumbent LEC.

2 OVERALL OBJECTIVES OF CHANGE MANAGEMENT

The objectives of change management include, amongst others, the following specifics:

- To provide a means of servicing requests for change to any aspects of the project and faults reported on it,
- To formally record and document each change,
- To evaluate the potential (and actual) influence of each change,
- To ensure that the appropriate processes and authority are/is in place to implement changes,
- To keep all involved parties aware of the status of changes.

3 CHANGE MANAGEMENT: A COMPARATIVE ANALYSIS OF QWEST

Change Management, in theory, should be an agreed upon process between the customer and supplier. Changes must be recorded, evaluated, budgeted, authorized and then monitored. A successful Change Management Process clearly defines roles and responsibilities, agreed upon time limits for authorization, and specific reporting requirements.

The diagram below depicts the key components of a Change Management process as defined within DELIVER, Cap Gemini Ernst and Young's (CGE&Y) web-based quality and delivery support system. DELIVER provides a consistent and transnational approach to the most current methods that CGE&Y has to offer. These principles are compatible with the ISO 9000 series of industry standards in the area of quality management. Further, they are consistent with the Software Engineering Institute's¹ Capability Maturity Model (CMM) for Software Quality², considered an industry standard in the field of software engineering.

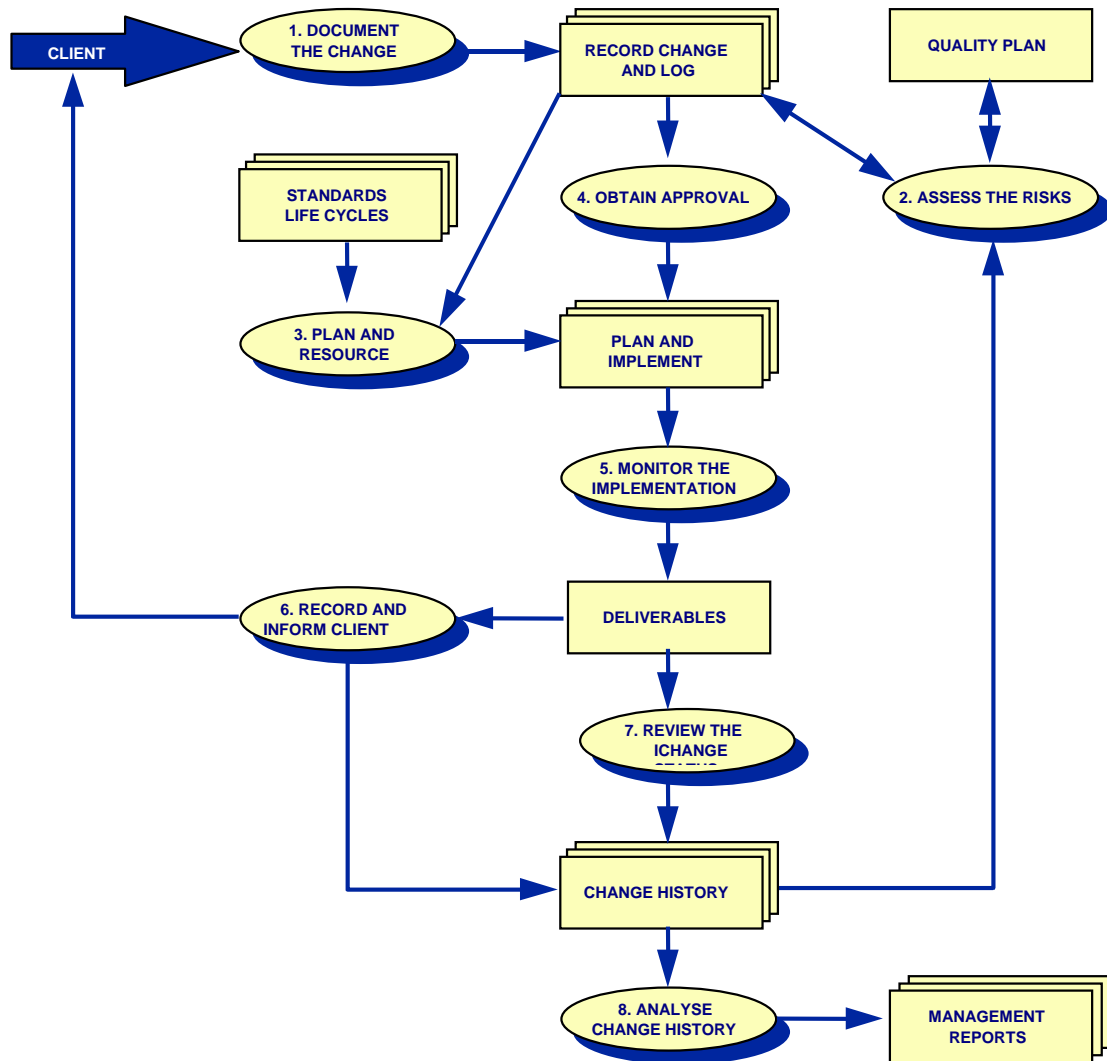
Features of DELIVER are:

- Access to various global and local Best Practices, which include: Samples, Examples, Templates, References, Techniques, Hints and Checklists
- Global application of integrated Knowledge, Learning and Methods
- Multiple ways of accessing information including Phases, Streams, and Events
- Work Breakdown Structure and Deliverable views
- Detailed Roles and Responsibilities information
- Downloadable method content for offline browsing
- Subject Matter Specialist Contacts for each method
- Expanded access and references to Learning assets
- Dynamic search capability using taxonomic labelling of Best Practices
- Direct links from defined component of your method to appropriate Knowledge and Learning assets, as identified by SMS
- Submission of Knowledge Objects as Local Best Practices

The following flow-chart depicts the high-level processes of the DELIVER methodology:

¹ SEI: a Carnegie-Mellon University institution established with funding from the US Department of Defense.

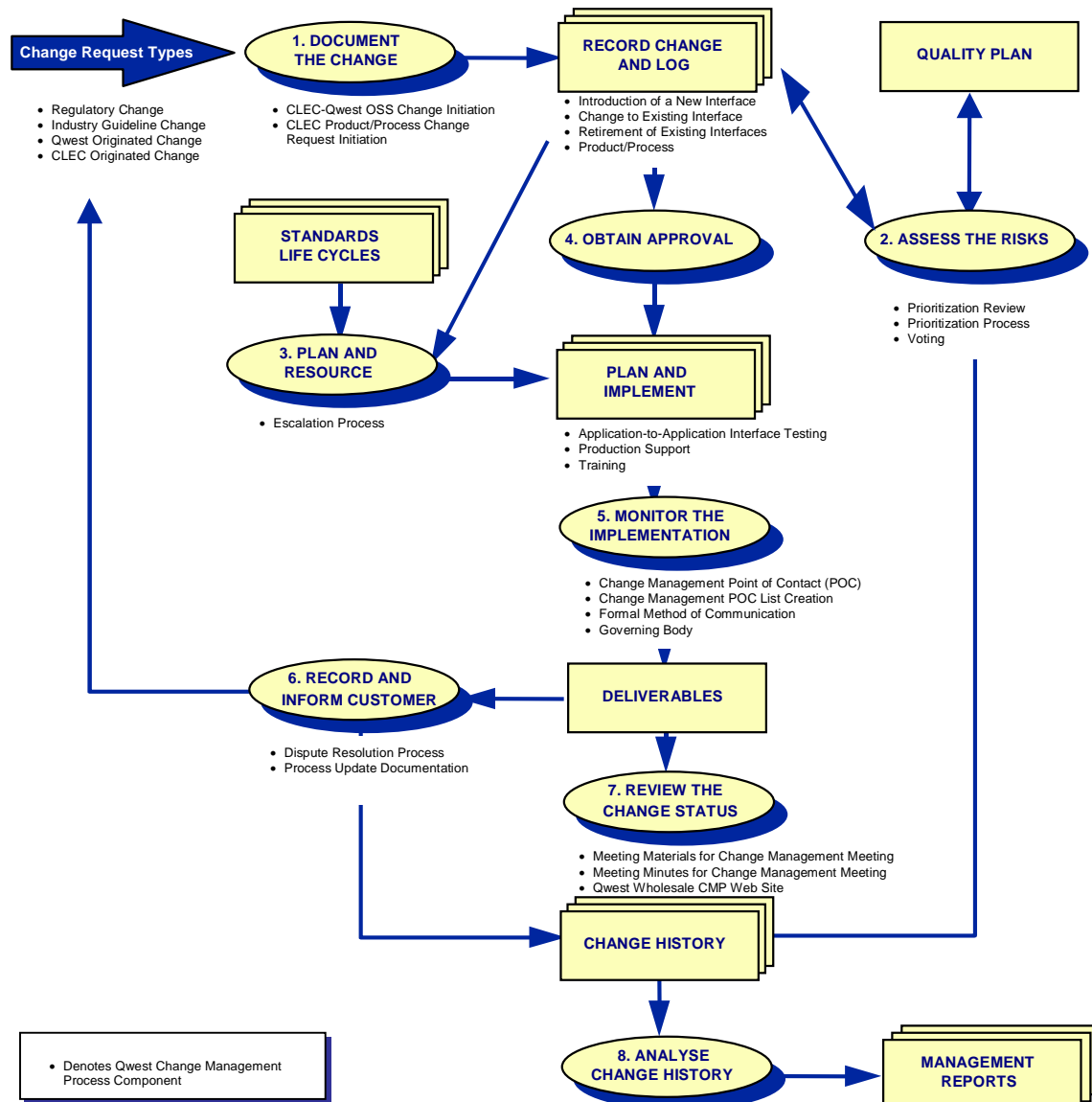
² The CMM was developed by the SEI for the US Department of Defense (DOD) to provide the DOD a tool with which to evaluate current and potential software vendors as to the quality and repeatability of their development processes.



Change Management Components

Cap Gemini Ernst and Young DELIVER Quality and Delivery Support System

Taking that same CGEY “should-be” snapshot, major elements of the Qwest Change Management Process have been identified beneath each component of the CGE&Y DELIVER Change Management Model – See Below.



Change Management Components

Cap Gemini Ernst and Young DELIVER Quality and Delivery Support System

With

Compatible Elements from the Qwest Change Management Process

4 BACKGROUND

CGE&Y was tasked with evaluating Qwest's Change Management Process (CMP), formerly referred to as the Co-Provider Industry Change Management Process (CICMP), as part of the overall Arizona §271 Operations Support Systems (OSS) Test. The guiding documents requiring this evaluation were the Master Test Plan (MTP), Section 7.2.5, and the Test Standards Document (TSD), Section 6.6. Within Qwest's Arizona §271 OSS Test, the evaluation of Change Management fell under a sub-evaluation called the Relationship Management Evaluation. This evaluation examined Qwest's management of its overall business relationships with Competitive Local Exchange Carriers (CLEC) and included most processes and documentation created for that purpose.

CGE&Y followed both the MTP and TSD in conducting its evaluation of Qwest's Change Management Process, and reached conclusions that were published in its Relationship Management Interim Final Report.

Important facets of both the MTP and TSD in regard to Change Management are:

- These documents only refer to Qwest's CMP in terms of changes to *OSS functionality* and the notification of those changes
- The MTP and TSD, for the most part, only require CGE&Y to make findings with respect to whether Qwest publishes its CMP processes, procedures, terminology, roles and responsibilities, and systems release schedules, and whether Qwest follows those processes. For instance, both the MTP, Section 7.2.5, and the TSD, Section 6.6.1, state:

“Qwest will be monitored and evaluated on its adherence to its published Methods and Procedures for change management.”

Sections 7.2.5 of the MTP and 6.6.2.3 of the TSD contain the following language:

“The TA will monitor the execution of the Change Management procedures based upon the observation criteria. *The purpose of this process is to ensure that Qwest is adhering to the methods and procedures it has established.*” (Emphasis added.)

Qwest's original CICMP would have been found to be adequate, with one exception, if CGE&Y had felt itself bound by the narrow focus of the governing test documents. Once CGE&Y began its evaluation it became clear that an important concept, albeit a difficult concept to quantify, was missing from the language of both the MTP and TSD, namely the adequacy of the CMP in general.

CGE&Y issued four Incident Work Orders (IWOs) regarding the CMP, two of which were based upon deficiencies of the process itself and therefore went beyond the scope of the TSD and MTP. These were AZIWO1075-1 and AZIWO1076-1 dealing with the non-collaborative

nature of the then-existing CICMP process and the length of time it took Qwest to act upon CLEC-initiated Change Requests (CRs). CGE&Y issued its third and fourth IWOs, AZIWO1078 and AZIWO1044, to bring to light test exceptions relating to TSD objective 6.6.2.2 (f) (timeliness of systems release documentation) and 6.6.2.3 (n) (lack of a stand-alone test environment for testing OSS systems changes).

In late June 2001, possibly in response to the IWOs mentioned above, Qwest announced an initiative to comprehensively redesign the CICMP in collaboration with the CLEC community. In announcing this effort Qwest proposed that the redesign group, as yet unformed, use as its starting point a draft document under consideration by the Ordering and Billing Forum (OBF) of the Alliance for Telecommunications Industry Solutions (ATIS). The document, known as OBF Issue 2233, is a draft guideline currently being negotiated within the OBF whose stated scope is "...processes for change management of manual and electronic interfaces relative to order and pre-order functions."³

The OBF document contains draft definitions, processes, and procedures in the following areas:

- Types of Change Requests
- Type 1 (Production Support)
- Type 2 (Regulatory)
- Type 3 (Industry Guideline)
- Type 4 (Provider Originated)
- Type 5 (Customer Originated)
- Change Request initiation process
- Introduction of a new interface
- Change to existing interfaces
- Retirement of existing interfaces
- Managing the Change Management Process
- Meetings
- Requirements Review
- Prioritization
- Escalation Process
- Interface Testing
- Training

Following a kick-off meeting in early July 2001, a redesign "core team" was formed to carry out the redesign process through attendance at the bi-weekly redesign meetings. The redesign core team is made up of representatives from Qwest, AT&T, WorldCom, Eschelon, Covad, McLeod USA, Sprint, SBC, Scindo, and Allegiance. This core team meets roughly every two weeks for a period of one to three days at a time.

³ OBF Issue 2233a1v1, Draft Copy, 12/14/2000 – Scope.

5 CURRENT STATE OF THE REDESIGN PROCESS

The redesign sessions continue on a bi-weekly basis. The last session attended by CGE&Y was held in Denver on 18-19 March 2002. CGE&Y also attended meetings in person in mid-November 2001 and by telephone at various other times during the redesign process. The meetings are facilitated by a contract employee hired by Qwest specifically for these meetings, and are attended by members of the core team and any required subject matter experts from Qwest.

The meetings are conducted in a professional manner. The facilitator permits all parties appropriate time to voice their views and opinions related to the issue on the table. Both the CLECs and Qwest are allowed time to caucus when they feel the need, and they are provided privacy to discuss the issue(s). The facilitator attempts to keep the time for caucusing to a minimum, but does allow both sides adequate time for discussions. The action items and issues log are updated in real time, with input from all the parties to ensure the action or issue is captured/closed to everyone's satisfaction. In the last meeting CGE&Y attended, there was a large amount of time devoted to updating/changing the language in the "Master Red-lined CLEC-Qwest CMP Re-Design Framework Interim Draft, Change Management Process (CMP) for Local Services". This was done in real time with input from all parties. All documents being updated were displayed on an overhead screen to enable all participants present to view the changes as they were being made.

The primary work product around which the redesign effort is centered is the master Change Management Process For Local Services document or, as it is known during the redesign process, the "Master Red-Lined CLEC-Qwest CMP Re-Design Framework." The redesign core team started this document using the basic structure of the OBF document, listed above, and has modified and expanded it to fit the unique requirements of the Qwest-CLEC relationship. To date, this document contains the following sections:

- **Types of Change Requests**
 - Regulatory Change
 - Industry Guideline Change
 - Qwest Originated Change
 - CLEC Originated Change
- **Change Request Initiation Process**
 - CLEC-Qwest OSS Interface Change Initiation Process
 - CLEC Product/Process Change Request Initiation Process
- **Introduction of a New Interface**
 - Introduction of a New Application-to-Application OSS Interface

- Introduction of a New Graphical User Interface
- **Change to Existing Interfaces**
 - Application-to-Application OSS Interface
 - Graphical User Interface
- **Retirement of Existing Interfaces**
 - Application-to-Application OSS Interface
 - Graphical User Interface
- **Managing the Change Management Process**
 - Change Management Point of Contact (POC)
 - Change Management POC List Creation
 - Formal Method of Communication
 - Governing Body
- **Meetings**
 - Meeting Materials for Change Management Meeting
 - Meeting Minutes for Change Management Meeting
 - Qwest Wholesale CMP Web Site
- **Prioritization**
 - Prioritization Review
 - Prioritization Process
 - Voting
- **Application-To-Application Interface Testing**
- **Production Support**
 - Newly Deployed OSS Interface Release
 - Request for a Production Support Change
 - Reporting Trouble to IT
 - Severity Levels
 - Status Notification for IT Trouble Tickets
 - Notification Intervals
- **Training**
- **Escalation Process**
 - Guidelines
 - Cycle
- **Dispute Resolution Process**

Not all of the above areas have been finalized, and the list of potential topics continues to grow. For instance, Qwest has proposed language for a Special Change Request Process whereby a party can, through an individual or group funding arrangement, request that a change be pushed

into production that was not prioritized for a particular release. The redesign team has also recently completed the drafting of a Technical Issues Escalation Process.

By agreement of the core team, the redesign effort is focusing on OSS change management before attempting to work through the product/process areas. Progress on many of these issues is slow. That is why agreement has been reached to implement these processes piece-meal on an interim basis as soon as the core team approves each one.

One of the most important interim processes implemented has been the inclusion of Qwest-originated CRs in the prioritization process for IMA release 10.0. Out of the first five CRs, three were Qwest-originated. The results of this prioritization were important for two reasons. First, it should help to ease Qwest's fear that its CRs, once open to CLEC prioritization, would not be implemented in a timely manner. Secondly, it should help to dispel the opinion held by some CLECs that Qwest's system changes, previously implemented outside the prioritization process, are not always beneficial to CLECs.

Other issues have come to or may come to impasse. One of these is the inclusion of Performance Indicator Definitions (PID) and Performance Assurance Plan (PAP) changes in systems releases as Regulatory Changes. Qwest views systems changes to meet PID or PAP requirements as regulatory mandates, and as such should be exempt from the standard prioritization process. The CLECs, on the other hand, feel that all CRs should be open for prioritization and that PID and PAP-related CRs, in any case, do not fall under the regulatory umbrella. Various proposals by both sides have been put forward, but the topic is still under negotiation. Ultimately it may fall to the regulatory bodies to decide.

Another such issue is the ability of CLECs to stop or "stay" a proposed product/process change by Qwest. The CLECs want the ability to stop Qwest from implementing a new product/process or a change to an existing product/process if they feel it would have a major impact on their businesses. They would like this ability to apply to both stopping a change from being implemented entirely, and also to "staying" a Qwest change while a proposal is under study or within the Escalation Process. Qwest feels that they should be able to make certain types of changes to products/processes by simply providing notice to the CLEC community before implementation. As with the previously mentioned issue, various proposals have been put forth to resolve this difference of opinion, including the use of a 3rd party arbitrator. Ultimately, this issue may also fall to state regulators to decide.

In speaking with various participants at the February 5-7, 2002, meeting it was stated that the Qwest redesign process has been slow and tedious and there are still several months of work remaining before it will be completed. The parties believe the effort is headed in the right direction but would like to see more in writing from Qwest on the more difficult areas that have been on the table for 4 to 5 months. The parties did state that Qwest has been decidedly more receptive to moving forward in the past couple of meetings in these difficult areas. Allegiance Telecom, which operates across the United States and deals with other ILECs, stated that Qwest's Change Management Process is more encompassing and responsive than the Change Management Processes they have encountered in dealing with the other ILECs. Qwest addresses system issues as well as product and process issues, which are not usually addressed in other ILEC Change Management Processes.

When the redesign effort is completed, Qwest's Change Management Process will go far beyond any other such process in the local telecommunications industry. What the CLECs are attempting to achieve is an all-encompassing process whereby all of Qwest's wholesale products and processes, the systems that drive and are driven by these products and processes, the documentation that details both the systems and products/processes, the contracts that cover

these areas, and the calculations by which all of the aforementioned are measured are kept in rigid synchronization by a system of presentation and prioritization. As such, it would become a quasi-regulatory process that would have implications for state regulators.

The following three sections contain analyses of Qwest's CMP. The first two compare the process as it currently exists with the Arizona TSD and with the FCC requirements for CMP functions. The third section analyzes the CLEC-identified unresolved issues in the CMP redesign and provides CGE&Y's findings on whether these issues fall within with FCC guidelines or the Texas, New York, or Massachusetts Orders.

5.1 TSD REQUIREMENTS MATRIX

The following table compares the state of the current process, as redesigned, with key requirements of the Arizona TSD.

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
<p>Does the Change Management Process information available to the CLECs clearly document the methodology, timing and communication of Qwest OSS software changes and releases?</p>	<p>The methodology is available in a single document, located on the web at: http://www.qwest.com/wholesale/downloads/2002/020314/MasterRedlineCLEAN030702.doc</p> <p>A comprehensive calendar of OSS interface releases and retirements is located on the web at: http://www.qwest.com/wholesale/downloads/2002/020315/Qwest_OSS_Calendar_Version_06.doc</p> <p>Change Request history available online (Source: CMP Database Issued and Maintained by Wholesale Change Management), including dates and details associated with each CR, at: http://www.qwest.com/cgi-bin/wholesale/whRedirect.cgi?filename=/2002/cmp/CLEC_Change_Request-Systems_Interactive_Reports.PDF, for Systems CRs, and product/process CRs: http://www.qwest.com/cgi-bin/wholesale/whRedirect.cgi?filename=/2002/cmp/CLEC_Change_Request-ProductProcess_Interactive_Reports.PDF</p> <p>Communication of changes is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on the web at: http://www.qwest.com/wholesale/cmp/releasenote.html.</p> <p>Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html</p>
<p>Are terms and definitions utilized in the Change Management Process information clearly documented?</p>	<p>The Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLEcQwestCMPRedFwRe03-07-02.doc contains terms and definitions. Although these have not been agreed to as of the publication of this report, CGE&Y found the Change Management-specific terms to be</p>

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
	consistent with industry standards.
<p>How are software releases handled? Are releases periodic and predictable (i.e., appropriately noticed) or random?</p>	<p>An OSS Release Calendar, containing planned implementation and retirement dates for interfaces, is located on the web at: http://www.qwest.com/wholesale/cmp/osscalendar.html</p> <p>The calendar also includes all relevant milestones associated with a release, such as:</p> <ul style="list-style-type: none"> ▪ CR submission cut-off date ▪ CR prioritization date ▪ Release packaging meeting date ▪ Draft technical specifications release date ▪ Final technical specifications release date ▪ Final Release Notes release date <p>Effective Date: The most recent OSS calendar is dated March 6, 2002 and includes releases through the end of 2002 for IMA (release 11.0). This calendar is located at http://www.qwest.com/wholesale/downloads/2002/020315/Qwest_OSS_Calendar_Version_06.doc.</p> <p>The other important mechanism by which Qwest informs CLECs of upcoming releases and release activities is the monthly CMP team meetings. All relevant information regarding team meetings, such as schedules, meeting materials, and other announcements, is located at the following locations on the web:</p> <p style="text-align: center;">Team Meetings Calendars http://www.qwest.com/wholesale/cmp/teammeetings.html</p> <p style="text-align: center;">Redesign Meetings Calendar http://www.qwest.com/wholesale/cmp/redesign.html</p> <p style="text-align: center;">Calendar of all CMP Team and Redesign Meetings http://www.qwest.com/wholesale/cmp/events.html</p> <p>The CMP participants meet monthly to discuss Product/Process and Systems Change Requests. The 12-Month Schedule is updated quarterly throughout the year to provide a rolling 12-month schedule.</p>
<p>Does the Change Management Process information available to the CLECs clearly explain how CLECs can request changes to the OSS? Does the documentation include forms for requesting changes and clear instructions</p>	<p>The CR initiation process is contained within the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLECQwestCMPRedFwRe03-07-02.doc.</p> <p>Although portions of the CR initiation process are still under negotiation, the process from the previous CMP</p>

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
for completing, submitting and tracking progress on CLEC change requests?	<p>process (i.e., before redesign) was straightforward and easy to understand. The form for initiating a CR and its instructions are located on the web at: http://www.qwest.com/wholesale/downloads/2001/011228/CR_Form_12-27-01</p> <p>Users can view all open CRs for both OSS and product/process at the following locations: CLEC Change Request - Product/Process Interactive Reports: http://www.qwest.com/cgi-bin/wholesale/whRedirect.cgi?filename=/2002/cmp/CLEC_Change_Request-ProductProcess_Interactive_Reports.PDF</p> <p>CLEC Change Request - Systems Interactive Reports: http://www.qwest.com/cgi-bin/wholesale/whRedirect.cgi?filename=/2002/cmp/CLEC_Change_Request-Systems_Interactive_Reports.PDF</p>
Does the Change Management Process provide for frequent scheduled communications regarding changes to the CLECs?	<p>Team Meetings are held once monthly; once each for OSS and Product/Process. All information related to the team meetings can be found on the web at: http://www.qwest.com/wholesale/cmp/teammeetings.html</p> <p>The information contained at the above location consists of:</p> <ul style="list-style-type: none"> • On-Line Sign Up Forms • Team Meeting Schedules • Team Meeting Distribution Packages • Team Meeting Minutes <p>The CMP participants meet monthly to discuss Product/Process and Systems Change Requests. The 12-Month Schedule is updated quarterly throughout the year to provide a rolling 12-month schedule.</p> <p>Communication of changes is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on the web at: http://www.qwest.com/wholesale/cmp/releasenote.html.</p> <p>Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html</p>
Are release notes issued as part of the Change Management Process? If so, are they complete, clearly written and distributed in a timely fashion allowing	<p>Release notes are issued as part of the CMP. The timeliness of release notices was the subject of AZIWO1078. The following language for the release of final technical specifications exists in the Master Redlined</p>

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
CLECs time to properly prepare for change?	<p>CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLEcQwestCMPRedFwRe03-07-02.doc:</p> <p>“Qwest’s planned implementation date will be at least 45 calendar days from the date of the final release requirement, unless the exception process has been invoked. Implementation timeline for the release will not begin until final specifications are provided.” The soonest this could be implemented would be with IMA release 10.0, so CGE&Y has not had the opportunity to verify that the 45-day deadline will be met. It must be noted that 45 calendar days is in line with the industry norm.</p>
Does the Change Management Process information available to the CLECs provide a clearly defined escalation process?	<p>CMP Escalations and Disputes</p> <p>Overview</p> <p>Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP. CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process.</p> <p>Language addressing the Escalation/Dispute Resolution process is contained in the most recent version of the Master Redlined CLEC-Qwest CMP Re-Design Framework located in the Redesign Documentation Section of the CMP Redesign Web site: http://www.qwest.com/wholesale/cmp/redesign.html</p>
If Change Management Processes, escalation processes or other Qwest processes providing information as to how CLECs communicate, track, or escalate changes are web based, are the URLs for this information communicated to CLECs via multiple avenues?	<p>The preferred method of communication is e-mail with supporting information posted to the web site.</p> <p><u>Qwest Release Notifications - Product/Process</u></p> <p>Qwest Release Notification Log - Product/Process: http://www.qwest.com/wholesale/downloads/2001/010824/Qwest_RN_Log_824011.doc</p> <p>Master Red-Lined CLEC-Qwest CMP Re-Design Framework</p> <hr/> <p>Interim Draft:</p> <p>Item must be formally escalated as an e-mail sent to the Qwest CMP escalation e-mail address: http://www.qwest.com/wholesale/cmp/escalations_dispute.html</p>
Are the roles and responsibilities of each party clearly communicated in the Qwest	The change management organizational structure must support the CMP. Each position within the organization

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
<p>Change Management and escalation processes?</p>	<p>has defined roles and responsibilities as outlined below. (Master_Redlined_CLEC-Qwest_CMP_Redesign_FrameworkC.doc)</p> <p><u>CMP Team:</u> Representatives are from the CLECs (or their authorized agents) and Qwest. This team meets monthly to review, prioritize, and make recommendations for change management requests. The change management requests are used as input to internal change management processes.</p> <p><u>CMP Steering Committee:</u> The CMP Steering Committee consists of representatives from the CLECs and Qwest who will be responsible for managing compliance to the CMP document. The responsibilities of the CMP Steering Committee are:</p> <ul style="list-style-type: none"> • On-going commitment • Participation in change management meetings/conference calls • Reviewing changes/suggestions to the CMP document for submittal to OBF • Process improvements • Managing meeting schedule/logistics <p>A standing agenda item at the regular change management meetings will provide an opportunity for Qwest and CLECs to assess the effectiveness of the CMP. Both the CLECs and Qwest will use this opportunity to provide feedback of instances of non-compliance and commit to taking appropriate action(s).</p> <p><u>Provider POC:</u> Qwest POC is responsible for managing the CMP. Qwest POC will be responsible for maintaining the integrity of the change requests, preparing for and facilitating review meetings, presenting change requests to Qwest's internal CMP, and ensuring that all notifications are communicated to the appropriate parties.</p> <p><u>CLEC POC:</u> The CLEC POC will serve as the official designee for all matters regarding CMP, including:</p> <ul style="list-style-type: none"> • Submission of CLEC change request forms • Notification of critical matters, such as Type 1 errors <p><u>Release Management Team:</u> A team of CLEC and provider representatives who manage the implementation of scheduled releases.</p>
<p>Does the documentation available to CLECs for Qwest Change Management Processes clearly identify how change</p>	<p>Section 3.0 of the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/</p>

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
requests will be evaluated and prioritized for inclusion in future releases?	MRedCLEcQwestCMPRedFwRe03-07-02.doc contains prioritization language. Although the parties have yet to finalize the prioritization process, they have made progress toward agreement on this issue.
Does the Change Management Process information available to CLECs clearly explain how changes to the Process and forms utilized by the process will be accomplished? If so, is it clear how the new process will be distributed and how new forms will be distributed/implemented and the old process and forms retired?	<p>The following language is contained in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLEcQwestCMPRedFwRe03-07-02.doc:</p> <p>See 1.0 Introduction and scope (Master_Redlined_CLEC-Qwest_CMP_Redesign_FrameworkC.doc)</p> <p>This document defines the processes for change management of OSS interfaces, products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services provided by CLECs to their end users.</p> <p>The CMP is managed by CLEC and Qwest representatives each having distinct roles and responsibilities. The CLECs and Qwest will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.</p> <p>Qwest will track changes to OSS interfaces, products and processes. The CMP includes the identification of changes and encompasses, as applicable. Qwest will process any such changes in accordance with the CMP described in this document.</p> <p>The CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings. The parties agree to act in Good Faith in exercising their rights and performing their obligations pursuant to this CMP. This document may be revised, through the procedures described in Section (X).</p>

TSD Section 6.6.2.2 Requirement	CGE&Y Finding
If utilized, are release life cycles clearly described including all activities required by each segment of the lifecycle?	The OSS Release Calendar located at http://www.qwest.com/wholesale/cmp/osscalendar.html contains the release lifecycle. Specific steps and outputs of each step are being negotiated in the CMP redesign and will be contained in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLEcQwestCMPRedFwRe03-07-02.doc . Much of the framework has already been agreed to by the redesign core team. Language regarding the specific outputs of each step in the lifecycle are still being negotiated.
Monitor and evaluate Qwest's ability to execute one significant software release through implementation	Because the redesign process is still underway, it is not possible to report on Qwest's ability to execute a significant software release following the "new" process at this time. CGE&Y has already reported on Qwest's previous process in its Arizona §271 OSS Test Final Report.
Is there a process in place to notify CLECs in advance of planned system outages?	Communication of planned outages is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on the web at: http://www.qwest.com/wholesale/cmp/releasenote.html . Notification of unplanned outages is accomplished through automatic e-mail notification. Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html
Is there a process in place to notify CLECs of unplanned system outages?	Notification of unplanned outages is accomplished through automatic e-mail notification. Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html

5.2 FCC REQUIREMENTS MATRIX

The following table compares Qwest's current CMP process, as redesigned, with the FCC requirements for an adequate CMP.

FCC Requirements	Reference	CGE&Y Evaluation
"Adequate" CMP		
1. Clearly Organized and Accessible to Competitors	<p>NY Order at ¶107</p> <p>TX Order at ¶110</p> <p>MA Order at ¶104</p>	<p>The methodology is available in a single document, located on the web at: http://www.qwest.com/wholesale/downloads/2002/020314/MasterRedlineCLEAN030702.doc</p> <p>A comprehensive calendar of OSS interface releases and retirements is located on the web at: http://www.qwest.com/wholesale/downloads/2002/020315/Qwest_OSS_Calendar_Version_06.doc</p> <p>Change Request history available online (Source: CMP Database Issued and Maintained by Wholesale Change Management), including dates and details associated with each CR, at: http://www.qwest.com/cgi-bin/wholesale/whRedirect.cgi?filename=/2002/cmp/CLEC_Change_Request_Systems_Interactive_Reports.PDF, for Systems CRs, and product/process CRs: http://www.qwest.com/cgi-bin/wholesale/whRedirect.cgi?filename=/2002/cmp/CLEC_Change_Request_ProductProcess_Interactive_Reports.PDF</p> <p>Communication of changes is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on the web at: http://www.qwest.com/wholesale/cmp/release_note.html</p> <p>Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html.</p>

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
2. CLEC’s Input and Participation in the CMP	<p>NY Order at ¶106</p> <p>TX Order at ¶111, 112, 116</p>	<p>The 12-Month Schedule is updated quarterly throughout the year to provide a rolling 12-month schedule. It includes the planned implementation and retirement dates of the various interfaces, if applicable. It can be found at: http://www.qwest.com/wholesale/cmp/ossca_lendar.html. Qwest has long ago implemented versioning of interfaces, and it is always made clear which version of the interface is the current one.</p> <p>Qwest supports the previous major Interconnect Mediated Access (IMA) EDI release for six (6) months after the subsequent major IMA EDI release has been implemented.</p> <p>Qwest makes one version of a Graphical User Interface (GUI) available at any given time and will not support any previous versions.</p> <p>The CMP participants meet monthly to discuss Product/Process and Systems Change Requests. Monthly meetings are announced via e-mail notification, and schedules, agendas, and all meeting materials are posted on the web at: http://www.qwest.com/wholesale/cmp/team_meetings.html</p> <p>The CR initiation process is defined in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLECQwestCMPRedFwRe03-07-02.doc and describes the various types of CRs, who can initiate them, and how they are prioritized.</p> <p>The prioritization review provides the forum for reviewing and prioritizing change</p>

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
		<p>requests. Meetings will be held monthly, or more frequently if needed, and are open to all CLECs. Current language regarding prioritization can be found in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLECQwestCMPRedFwRe03-07-02.doc</p> <p>Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP. CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process. Instructions and the form for initiating an escalation are located at: http://www.qwest.com/wholesale/cmp/escdisp.html</p> <p>Specific language detailing the current escalation and dispute resolution processes is contained in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLECQwestCMPRedFwRe03-07-02.doc</p> <p>Additionally, users can view ongoing escalations by clicking the links located at: http://www.qwest.com/wholesale/cmp/escalations.html</p> <p>The CMP redesign “core team” meets twice monthly. The team is made up of representatives from several CLECs and Qwest. A separate website has been created for the redesign process, and contains all working documents being discussed in the redesign meetings. This website is located at: http://www.qwest.com/wholesale/cmp/redesign.html</p> <p>Documentation includes: Meeting Notice, Presentation Packages, CLEC Comments,</p>

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
		Redesign Documentation, Meeting Minutes, Team Members, Issues and Action Log, Guiding Documentation.
3. Independent Dispute Resolution for CMP Issues	NY Order at ¶108 TX Order at ¶112	<p>Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP. CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process.</p> <p>This process does not limit any party’s right to seek remedies in a regulatory or legal arena at any time.</p> <p>Escalations: In the event that a CLEC wishes to initiate an Escalation it should submit a completed Escalation form, located at: http://www.qwest.com/wholesale/cmp/escalations_dispute.html.</p> <p>Escalations may involve issues related to CMP itself, including the administration of the CMP. The expectation is that escalation should occur only after change management procedures have occurred per the CMP.</p> <p>Dispute Resolution: In the event that an impasse issue develops, a party may pursue the Dispute Resolution Process by submitting the Dispute Resolution form located at: http://www.qwest.com/wholesale/cmp/escalations_dispute.html</p>
4. Testing Environment	TX Order at ¶134 NY Order at ¶¶109-10, 110, 119 & n. 301 MA Order at ¶109-10	<p>Qwest provides a Stand-Alone Test Environment (SATE) for use by CLECs in conducting new entrant testing and upgrade (i.e., progression) testing. The functionality of this test environment has been evaluated by Hewlett Packard Consulting. Guidelines for the use of SATE are contained in the Qwest’s EDI Implementation Guide located at: http://www.qwest.com/wholesale/downloads/2002/020219/IMA_EDI_Implementation_Guidelines9_1.doc</p>

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
		<p>SATE-specific technical information is located on the web at: http://www.qwest.com/wholesale/ima/edi/document.html</p> <p>The 12-Month OSS Release Schedule is updated quarterly throughout the year to provide a rolling 12-month schedule. It includes the planned implementation and retirement dates of the various interfaces, if applicable. It can be found at: http://www.qwest.com/wholesale/cmp/osscalendar.html. Qwest has long ago implemented versioning of interfaces, and it is always made clear which version of the interface is the current one.</p> <p>Qwest supports the previous major Interconnect Mediated Access (IMA) EDI release for six (6) months after the subsequent major IMA EDI release has been implemented.</p> <p>Qwest makes one version of a Graphical User Interface (GUI) available at any given time and will not support any previous versions.</p> <p>Communication of planned outages is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on the web at: http://www.qwest.com/wholesale/cmp/release_note.html</p> <p>Notification of unplanned outages is accomplished through automatic e-mail notification. Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html</p>

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
5. Notification and Documentation	<p>NY Order at ¶113</p> <p>TX Order at ¶¶116, 119, 126, 122</p> <p>MA Order at ¶105</p>	<p>The 12-Month OSS Release Schedule is updated quarterly throughout the year to provide a rolling 12-month schedule. It includes the planned implementation and retirement dates of the various interfaces, if applicable. It can be found at: http://www.qwest.com/wholesale/cmp/ossalendar.html. Qwest has long ago implemented versioning of interfaces, and it is always made clear which version of the interface is the current one.</p> <p>Qwest supports the previous major Interconnect Mediated Access (IMA) EDI release for six (6) months after the subsequent major IMA EDI release has been implemented.</p> <p>Communication of changes is accomplished through electronic mailings, US Postal Service mailings, and by posting the notification on the web. Notifications are posted on the web at: http://www.qwest.com/wholesale/cmp/releaseasenote.html.</p> <p>Instructions for users to subscribe to the automatic e-mail notification system can be found at: http://www.qwest.com/wholesale/notices/cnla/maillist.html.</p> <p>Terms used in the CMP are contained in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLECQwestCMPRedFwRe03-07-02.doc. While the “Terms” section of this document has not been finalized and agreed to by the parties, CGE&Y found the terms that related to the CMP process to be consistent with industry standards.</p> <p>Qwest and the CLEC community have agreed to an interim Escalation and Dispute Resolution Process as part of the CMP.</p>

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
		<p>CLECs and Qwest will work together in good faith to resolve any issue brought before the CMP before initiating the Escalation or Dispute Resolution Process. The specific language for the Escalations and Dispute Resolution Process is located in the Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLECQwestCMPRedFwRe03-07-02.doc.</p> <p>Specific instructions for initiating an escalation or dispute resolution can be found at: http://www.qwest.com/wholesale/cmp/escdispute.html.</p> <p>This process does not limit any party’s right to seek remedies in a regulatory or legal arena at any time.</p> <p>Escalations: In the event that a CLEC wishes to initiate an Escalation it should submit a completed Escalation form, located at: http://www.qwest.com/wholesale/cmp/escalations_dispute.html.</p> <p>Escalations may involve issues related to CMP itself, including the administration of the CMP. The expectation is that escalation should occur only after change management procedures have occurred per the CMP.</p> <p>Dispute Resolution: In the event that an impasse issue develops, a party may pursue the Dispute Resolution Process by submitting the Dispute Resolution form located at: http://www.qwest.com/wholesale/cmp/escalations_dispute.html</p>
6. Training, Technical Assistance, and Help Desk	TX Order at ¶108, 122, 121 NY Order at ¶126, 127 MA Order at ¶114	Help desk reporting procedures and technical escalation procedures are being discussed as part of CMP redesign, and language being incorporated into the

FCC Requirements	Reference	CGE&Y Evaluation
“Adequate” CMP		
Support		<p>Master Redlined CLEC-Qwest CMP Re-Design Framework document located at: http://www.qwest.com/wholesale/downloads/2002/020311/MRedCLEcQwestCMPRedFwRe03-07-02.doc.</p> <p>For detailed findings on Qwest’s Technical Training and Help Desk Support, please see CGE&Y’s Arizona §271 OSS Test Final Report, Section 5 (Relationship Management).</p>
7. Adhered to the CMP over time	<p>NY Order at ¶101</p> <p>TX Order at ¶106</p>	<p>Insufficient time has passed since the inauguration of the redesign process to determine whether Qwest has established a pattern of compliance with its redesigned CMP over time. CGE&Y has previously showed that Qwest did comply with its previous process over an extended period of time.</p>

5.2.1 CLEC Issues

The following section contains CGE&Y's analysis of CLEC issues regarding CMP. The issues were taken originally from AT&T's List of Priority CMP Issues filed with the Arizona Corporation Commission on 3/5/02. This list was adopted by the CLECs at the March 5-7, 2002, CMP redesign meeting as being representative of CLEC issues as a whole. The list was prioritized at that meeting and the issues discussed in the order they were prioritized.

The purpose of this section is to provide CGE&Y's analysis of these issues, and to compare them with the Federal Communications Commission (FCC) requirements for CMP and the Orders issued in other states where §271 approval has been granted to the incumbent Local Exchange Carrier (LEC).

1. Criteria Used to Determine the Method of Implementing Regulatory Changes

Although a process for implementing regulatory changes must be included in the CMP, the FCC orders do not specify what criteria must be used to determine the method of implementation or how the processes for implementation must operate or be structured. The only guidance in the orders is that the dates and timelines associated with each change, including those for the Bell Operating Company's (BOC) provision of specifications to CLECs and for the CLECs to comment thereon, must be "clearly reflected" in the CMP documentation. TX Order at ¶110; MA Order at ¶104.

This issue is not addressed in Verizon's CMP. Southwestern Bell Corporation's (SBC) CMP states that, if a timeframe is not specified, regulatory changes "shall be subject to the CMP process as described in the [CMP]." SBC CMP § 6.2.4. However, SBC's CMP does not state the criteria for determining the method of implementation.

This issue is currently being addressed by Qwest and the CLECs. See CLEC-Qwest Change Management Redesign Working Sessions Core Team Issues/Action Items Log ("CMP Issues Log") (OPEN) at #243; www.qwest.com/wholesale/cmp/redesign.html (Redesign Documentation/ Regulatory CR Implementation Language). See also Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft – 03-07-02 ("Qwest CMP") at § 3.1. Currently, it appears that there are two methods of implementation, manual and mechanized, and the criteria that will be used to determine the proposed method of implementation include: (1) an estimated volume; (2) an estimated Level of Effort (LOE) for implementing a manual solution; and (3) an estimated LOE for implementing a mechanized solution. Qwest CMP at § 3.1. The LOE is to be expressed in terms of the range of hours required to complete. Qwest CMP at § 3.1. Other criteria may, but need not, include: (1) cost; (2) estimated volume; (3) number of CLECs; (4) technical feasibility; (5) parity with retail; and/or effectiveness/feasibility of the manual process. Qwest CMP at § 3.1. In deciding between mechanized and manual implementation, the parties will consider the midpoint of each LOE range, and, if (a) the difference between the two is less than 10% of the larger LOE and (b) Qwest did not rely on other criteria to determine the proposed method, then the decision will be based on majority vote. Qwest CMP at § 3.1.

If Qwest is not able to fully implement a mechanized solution on the first release, Qwest's implementation plan for the mechanized solution may include a short-term manual work-around until the mechanized solution can be implemented. Qwest CMP at § 3.1. A plan to implement a manual solution may include a provision to implement a mechanized solution if volume warrants it. Qwest CMP at § 3.1. If a CLEC disagrees with the

proposed plan because it disagrees with Qwest's estimate of the volume, the CMP provides a process for an exchange of positions to resolve differences. Qwest CMP at § 3.1. There is a dispute resolution process with escalation for disagreements with the final implementation plan. Qwest CMP at § 3.1.

2. Copies of Internal Documentation re Prioritization and Sizing

The FCC's orders do not address whether a BOC must provide CLECs with the BOC's internal documentation regarding prioritization and sizing. However, the issue is whether such documentation is required to provide an efficient CLEC with a meaningful opportunity to compete. See NY Order at ¶113; TX Order at ¶¶119, 122, 126 (a CMP should provide for clear, comprehensive, and detailed documentation of upcoming change management in a reasonable manner such that the efficient competitor has a meaningful opportunity to compete). Nothing in the FCC's orders suggests that provision of a BOC's internal documentation regarding prioritization and sizing is part of providing an efficient CLEC with a meaningful opportunity to compete.

This issue is not addressed in SBC's CMP. Although Verizon's CMP describes the prioritization process, Verizon CMP § VI, it does not address whether Verizon must provide the CLECs with Verizon's internal documentation on prioritization. The only documents Verizon is obligated to provide regarding prioritization relate to documents to be provided prior to the monthly "Prioritization Working Group" meetings. See Verizon CMP § VI (prior to the meeting, Verizon distributes meeting materials, which include an agenda, a prioritized spreadsheet of Verizon and CLEC initiated CRs, a spreadsheet of not rated and re-rated CRs, and new CLEC-initiated CRs). Verizon's CMP does not mention sizing or documentation of sizing.

It appears that Qwest and the CLECs have resolved this issue to the effect that Qwest will not provide the CLECs with Qwest's internal documentation regarding prioritization and sizing. See CMP Issues Log (CLOSED) #196, although CGE&Y understands that this was resolved over CLEC objections. This issue is not mentioned in Qwest's CMP. This resolution is consistent with the absence in the FCC's orders of a requirement to provide such documentation.

3. Status of Change When Escalation or Dispute Resolution is Invoked; Inequitable Treatment of CLEC CRs

A. Status of Change During Escalation or Dispute Resolution

The FCC's requirements regarding CMPs strongly suggest that, generally, a change that is the subject of an escalation or dispute resolution process should not be implemented over a CLEC's objection but should instead be tabled or stayed pending resolution of the escalation or dispute resolution process.

A key component of the FCC's CMP requirements is that the CLECs must have substantial and continuing input, participation, and opportunity to provide feedback regarding the design and ongoing operation of the CMP, including regarding proposed changes. NY Order at ¶106; TX Order at ¶111. Thus, changes should be implemented only after input and feedback from the CLECs. NY Order at ¶106. The CMP should provide that, after the BOC and the CLECs have exchanged ideas and views, there will be a "go/no go" vote, a process which permits CLECs to decide

whether or not to implement a new release and allows any CLEC that will be adversely affected by the implementation of a release to request that it be delayed. TX Order at ¶¶111, 112, 116. The “go/no go” procedure should include “a process for identifying and resolving issues related to the [CMP] in a timely manner.” TX Order at ¶112.

Except for emergency changes, which require only advance notification, a change may not be implemented unless there is consensus to do so between the BOC and the CLECs. NY Order at ¶116; TX Order at ¶111. Because a consensus does not require unanimity, it appears that a change that is supported by the BOC and a consensus/majority of the CLECs may be implemented over a CLEC’s objection. However, the “go/no go” provision allows an objecting CLEC to defer implementation of the change as to that CLEC pending resolution of the dispute through a dispute resolution process. TX Order at ¶¶111, 112, 116. Indeed, the “go/no go” procedure should include a dispute resolution process. See TX Order at ¶112 (the “go/no go” procedure should include “a process for identifying and resolving issues related to the [CMP] in a timely manner”). The BOC may proceed with the implementation of the change, provided that the BOC does so in a way that permits the objecting CLEC to defer the implementation of the change and to continue to operate under the pre-change conditions pending resolution of the dispute. NY Order at ¶124. This appears to be an application of versioning, a process whereby the BOC maintains the current and most recent versions of the software so that a CLEC can access a previous version in the event of an issue or problem concerning a new release. See TX Order at ¶112.

Based on the foregoing, the CMP must include a provision that permits an objecting CLEC to defer or stay the implementation of a change pending the outcome of a dispute resolution process. The change may be implemented as to the non-objecting CLECs if the BOC uses versioning or some other mechanism to permit the objecting CLEC to continue to operate under the pre-change regime.

The Verizon CMP does not expressly state what happens to the change pending escalation or dispute resolution. However, it seems to be drafted based on the assumption that the change is not implemented until the full dispute resolution/escalation process is resolved. See Verizon CMP § XV.

The SBC CMP provides that a change will not be implemented unless and until the dispute resolution process, SBC CMP § 7.0, is resolved in favor of implementation. *See, e.g.*, SBC CMP § 3.3.14 (testing on a change to an existing Gateway interface will commence only if no Final Release Requirements dispute resolution process is started or if such dispute resolution process is successfully concluded); SBC CMP § 3.3.16 (SBC will only implement a change to an existing Gateway interface if no dispute resolution process is initiated after testing or the dispute resolution process has been successfully concluded); SBC CMP § 3.5.9 (SBC will implement a change to an existing GUI interface only if there is no pending dispute resolution process or after the successful resolution of that process); SBC CMP § 4.2.16 (testing on new Gateway interfaces will not start until and unless the dispute resolution process has been completed and has been decided in favor of implementation); SBC CMP § 4.2.18 (following testing, a new Gateway interface will not be implemented until and unless the dispute resolution process has been completed and has been decided in favor of implementation); SBC CMP § 4.3.12 (a new GUI interface will not be implemented unless and until the dispute resolution process has been completed and has been decided in favor of implementation). See also SBC CMP § 5.2.8 (the

retirement of an interface will not be implemented until and unless the dispute resolution process has been completed and has been decided in favor of implementation).

It appears that Qwest and the CLECs are working on this issue and have proposed extensive stay procedures. See CMP Issues Log #226; www.qwest.com/wholesale/cmp/redesign.html (Qwest Proposed Stay Language Revised 02-27-02).

B. Inequitable Treatment of CLEC CRs

CMP Gap Analysis #20, cited on the issues list, suggests that the CLECs are concerned with Qwest's ability to unilaterally impose its own CRs over the CLECs' objections. This sub-issue regarding the inequitable treatment accorded Qwest-initiated changes and CLEC-initiated changes is addressed in the FCC's orders. Simply put, inequitable treatment of CRs based on the sponsor of the CR violates the FCC's CMP requirements.

BOC-initiated changes are one of the five most common categories of changes identified by the FCC as being subject to a CMP Agreement. NY Order at ¶105; TX Order at ¶110; MA Order at ¶104. Thus, as with each of the five types of changes, Qwest-initiated changes must have a documented process for the introduction, modification, and termination of Qwest-initiated changes and that process must include dates and timelines for Qwest-initiated changes. TX Order at ¶110; MA Order at ¶104. Furthermore, Qwest-initiated changes, like all changes, must be prioritized based on merit rather than on the sponsor of the change. NY Order at ¶106. Thus, the CRs need to receive equal treatment regardless of the source. Moreover, as noted above, Qwest-initiated changes are subject to a "go/no go" vote process, which should lessen the inequitable treatment. TX Order at ¶¶111, 112, 116. Therefore, the FCC's CMP requirements prohibit any process whereby Qwest's CRs receive priority over, or different treatment than, the CLEC's CRs.

Verizon's CMP provides that, although the CLECs may prioritize both CLEC and Verizon-initiated CRs, decisions as to implementation "remain within Verizon's discretion, consistent with applicable law and regulatory authority and resource constraints." Verizon CMP § VIII. The CLECs' prioritization is simply one factor that Verizon will consider in the exercise of its discretion. Verizon CMP § VIII. In contrast, SBC's CMP does not appear to include a provision for prioritization.

CGE&Y issued AZIWO1075-1 to address the fact that the previous CMP process only allowed for the discussion and prioritization of CLEC-originated CRs. The current version of Qwest's CMP does provide for prioritization of CLEC or Qwest-initiated CRs regarding existing interfaces. Qwest CMP § 9.0. It does not provide for prioritization of CLEC or Qwest-initiated CRs regarding new interfaces or the retirement of older interfaces. Qwest CMP § 9.0. Due to issues of externally driven timelines, separate prioritization procedures exist for regulatory changes and industry guidelines changes. Qwest CMP § 9.1. The prioritization process appears to be sponsor-neutral, as it allows both Qwest and the CLECs to rank the CRs and is based on "the results of the votes received by the deadline" and "the outcome of the final ranking of the CR candidates." Qwest CMP § 9.2.3. Moreover, if either Qwest or a CLEC feels that a CR was not ranked high enough, it may invoke a separate procedure – the CMP Special Change Request Process ("SCRP") – as a fallback, though the SCRCP does not supersede the main CR process. Qwest CMP § 9.3.

AZIWO1075-1 was closed following the collaborative prioritization process conducted during the IMA release 10.0 release discussions.

4. The Criteria for a Denial of a Change Request

The FCC's orders do not directly address whether a BOC must expressly state the criteria and the reasons for a denial of a CLEC's CR. The CMP Agreement should define the procedure by which a CLEC should submit a CR. TX Order at ¶111 n.290. In determining whether to accept or reject a CR, the BOC should consider factors such as cost, cost reduction, feasibility, and user benefits. *Id.* However, it is not clear whether the criteria or factors must be documented in the CMP, as the source for the criteria in the Texas Order was an SBC affidavit. *See id.*

Verizon's CMP does not address this issue. Although SBC's CMP states that it will send a requesting CLEC a "not approved status" form, it is silent as to whether the reasons for the denial must be provided. SBC CMP App. G, § IV. However, the SBC CMP does indicate that "[I]n making a decision whether to include a CLEC [CR] in requirements, SBC will consider such factors as feasibility, costs, user benefits[,] and cost reduction." SBC CMP § 8.1. See also SBC CMP App. G, § IV (SBC's Internal Team will use the following criteria to evaluate the CLEC-initiated CR: (1) technical feasibility, including whether it lines up with the direction for that particular OSS; (2) assuming that it is technically feasible, the time and cost of the CR; and (3) the ability of the CR to fit into the interface's schedule).

This issue appears to have been resolved by Qwest and the CLECs through an agreement as to the reasons for a denial of a CR and the process for denying a CR. See CMP Issues Log (CLOSED) #118; www.qwest.com/wholesale/cmp/redesign.html (Redesign Documentation/Qwest Proposed Reasons to Deny CRs – Revised 03-07-02). As of the March 3, 2002 draft, the reasons include: (1) technologically not feasible; (2) regulatory ruling/legal implications; (3) requested change not beneficial; (4) outside scope of CMP; and (5) economically not feasible. See www.qwest.com/wholesale/cmp/redesign.html (Redesign Documentation/ Qwest Proposed Reasons to Deny CRs – Revised 03-07-02).

Gap Analysis #59, cited on the issues list, suggests that AT&T is concerned with inequitable treatment between Qwest-initiated CRs and CLEC-initiated CRs. Specifically, AT&T asserts that Qwest has the ability to unilaterally reject a CLEC's CR whereas a CLEC cannot reject a Qwest-initiated CR; that Qwest's CRs proceed over CLEC objections and force the CLECs to use the dispute resolution process whereas the opposite is not true; and that the CLECs must use the dispute resolution process both to advance their own CRs when rejected by Qwest and to oppose Qwest's CRs when Qwest ignores the CLEC's objections, whereas Qwest does not need to resort to the dispute resolution procedures. The issues raised in Gap Analysis #59 are addressed by the FCC's orders and are similar to those addressed in Issue #3B, *supra*. To the extent that AT&T's issues as set forth in Gap Analysis #59 are legitimate, it would appear that the practices complained of contradict the FCC's CMP requirements.

CGE&Y believes that AT&T's assertion, as stated above, may in part be based on a misunderstanding of the underlying issue. When a CR is initiated by a CLEC, Qwest's internal systems development staff evaluates it, and will make a determination as to whether to "accept" or "reject" it based on the criteria listed above: (1) technologically not feasible; (2) regulatory ruling/legal implications; (3) requested change not beneficial; (4) outside scope of CMP; and (5) economically not feasible. Since it is not their own systems development personnel who will be performing the actual work, and they don't

have visibility into Qwest's internal back-end systems, CLECs must initiate CRs without prior knowledge of the above five criteria, "in the blind" so to speak. If Qwest chooses to "reject" a CR based upon one of these criteria, it will provide the CLEC with the rationale for said "rejection." On the other hand, when Qwest submits a CR it has already done the analysis that it would do a CLEC-initiated CR after submission. Therefore, the CRs that Qwest initiates would have already passed the five "rejection" criteria before submission or the CR would never have made it to the CMP in the first place. This follows a standard Information Technology practice of screening CRs and evaluating them before placing them under Change Control.

Despite CGE&Y's disagreement with AT&T's characterization of this issue, Qwest cannot ignore the objections raised by the CLEC's regarding Qwest-initiated changes, as the CLECs must have the opportunity for meaningful participation in the CMP. The FCC is "concerned about the impact of a BOC disregarding input from [CLECs] on [CMP] issues. . .," NY Order at ¶124, and has cautioned "BOCs against the use of any process that would effectively nullify the standard procedures outlined in the formal change management documentation." TX Order at ¶131. Thus, the FCC requires that the CMP include a provision for the substantial and continuing input, participation, and feedback of competing carriers regarding the design and ongoing operation of the CMP, including for proposed changes. NY Order at ¶106; TX Order at ¶111. Not only must the CLECs have input in the design of the CMP Agreement, but they must also "continue to participate meaningfully in its operation." MA Order at ¶107. During the meetings, the BOC and the CLECs should develop and maintain a detailed chart of CLEC's requests for action on certain CMP issues, track the status of the problems, and note the BOC's actions to address the issues. NY Order at ¶124. The BOC must respond to a CLEC's concerns in a timely and effective manner. TX Order at ¶123. Thus, the CMP must provide a process by which the CLEC's can voice their concerns and receive a timely response from the BOC.

The CMP should include provisions for (1) prioritization of changes, reached by consensus, based on merit rather than on the identity of the sponsor of the change; and (2) a "go/no go" vote, which is a process for competitors to decide whether or not to implement a new release and permits any carrier that will be adversely affected by the implementation of a release to request that it be delayed." NY Order at ¶106; TX Order at ¶¶111, 112, 116. The "go/no go" procedure should include "a process for identifying and resolving issues related to the [CMP] in a timely manner." TX Order at ¶112.

The FCC's requirement that Qwest-initiated changes, like all changes, must be prioritized based on merit rather than on the sponsor of the change, NY Order at ¶106, suggests that the CRs need to receive equal treatment regardless of the source. Thus, Qwest's veto power must be structured such that both Qwest and the CLECs have similar authority while sharing the burden of resorting to the dispute resolution process. The "go/no go" vote process, TX Order at ¶¶111, 112, 116, appears to prevent a BOC from implementing a change over a CLEC's objection.⁴ Under the "go/no go" procedure, CLEC's could reject Qwest-initiated CRs and Qwest would then have to utilize the dispute resolution/escalation processes to obtain approval to implement such a change. Because this is the same process that the CLECs must go through when Qwest objects to a CLEC-

⁴ As noted in Issue #3A, under the "go/no go" procedure, an objecting CLEC can defer implementation of a change pending resolution of the issue through the dispute resolution process. Texas Order at ¶112. The BOC may proceed with the implementation of a change as to those CLECs not invoking the dispute resolution process, provided that the BOC does so in a way that permits the objecting CLEC to defer the implementation of the change and to continue to operate under the pre-change conditions pending resolution of the dispute. NY Order at ¶124. This appears to be an application of versioning, a process whereby the BOC maintains the current and most recent versions of the software so that a CLEC can access a particular version in the event of an issue concerning a new release. See TX Order at ¶112.

initiated change, a proper equitable balance will have been created. Thus, the inclusion of this FCC-approved provision would appear to address AT&T's concerns, as it would level the playing field by applying the same procedures to both Qwest and the CLECs.

Qwest's current CMP appears to provide for substantial CLEC input and participation. See Qwest CMP §§ 3.0 (CR initiation process); 8.0 (meetings); 9.0 (prioritization); 13.0 (escalation); 14.0 (dispute resolution process).

5. Clear Definition for the Description of the Output of Each Step of the CMP

The issue, as described more fully in Gap Analysis ##121-23, relates to a perceived imprecision in the language regarding Qwest's level of effort ("LOE"). See also CMP Issues Log (OPEN) #214. The FCC has addressed the level of precision it expects in the documentation: it should be clear, comprehensive, and contain detail sufficient to enable an efficient competitor to modify or design their systems so they can communicate with the BOC's OSS and any relevant interfaces. TX Order at ¶¶119, 122. However, the FCC's orders have not set forth any detailed requirements for this issue.

This issue is not addressed in either Verizon's CMP or SBC's CMP. Because of the subjective nature of the issue and due to the fact that the CMP is a work in progress, it is not clear whether this issue has been addressed in Qwest's CMP. Qwest has agreed, in principle, to provide certain details of the output of various CMP steps, but at this stage CGE&Y cannot comment on the ultimate outcome of this effort.

6. Identification of Changes That Impact CLECs and the Processes for Those Changes

There is no requirement that the CMP have a separate process to specifically identify and address any changes that impact CLECs. The FCC has categorized the changes by their source as opposed to by their impact. Thus, the CMP should have a process for each of the five types of changes: (1) emergency changes; (2) regulatory changes; (3) changes in industry standards; (4) changes initiated by the BOC; and (5) changes requested by a competitor. TX Order at ¶110; MA Order at ¶104. Each of these types of changes will necessarily cover those that impact CLECs. Moreover, except for an emergency change, which only requires advance notice, and a regulatory change, which is not likely subject to the approval of either the BOC or the CLECs, each change must be subject to advance notification, documentation, consensus, and the "go/no go" policy. NY Order at ¶116; TX Order at ¶¶111, 112, 116, 130. Because there is a process to address each of the five types of changes, the CMP will necessarily account for changes that impact CLECs. Therefore, the provision of a process for each of these types of changes would seem to preclude the necessity of having an additional process just to identify and govern changes that impact CLECs. Nevertheless, nothing in the FCC's orders prohibits a CMP from having such a process.

With respect to the process for a change that is agreed to by the BOC and the CLECs but results in an unanticipated effect on one or more CLECs after implementation, although the FCC does not directly address this particular scenario, several aspects of the FCC's CMP requirements are instructive. The required pre-release opportunity to use the BOC's testing environment should reduce the likelihood of such unintended, unknown impacts. See TX Order at ¶132 (requiring the BOC to provide pre-release access to a stable testing environment that mirrors the production environment to ensure that the CLEC's OSS will interact "smoothly and effectively with the BOC's OSS"). However, if such an

unintended, unknown consequence occurs, the CMP Agreement's normal processes for that change will likely remain applicable. For example, if the change is BOC-initiated, agreed-upon by the CLECs, and results in an unanticipated effect on a CLEC, the process for BOC-initiated changes and the general principles set forth by the FCC should remain applicable. Thus, at least two things should occur. First, the CLEC should have access to the previous version through the BOC's versioning procedures, TX Order at ¶¶112, 115, which will allow the CLEC to continue operations uninterrupted pending the resolution of the problem. Second, the CLEC and the BOC must then work together to resolve the problems in a timely fashion. See TX Order at ¶112 (the "go/no go" procedure should include "a process for identifying and resolving issues related to the [CMP] in a timely manner"); TX Order at ¶140 (citing an example of a timely resolution to a post-release problem). Therefore, it appears that the CMP should include a process for this post-implementation problem solving, that this process should be made part of the processes in place for each type of change, and that the process should include a timeline for responsiveness and resolution.

This issue is not addressed in Verizon's CMP. SBC's CMP states that it covers "changes to OSS interfaces that affect CLECs' production or test environments." SBC CMP § 3.1. Such changes may include (1) operations changes to existing functionality that impact the CLEC interfaces on SBC's release date; (2) technology changes that require CLECs to make changes to meet new technical requirements; (3) additional functionality changes that may be used at the CLEC's option; and (4) regulatory changes. SBC CMP §§ 3.1.1-3.1.4. However, because these changes are at the core of SBC's CMP, there is no separate or specific process to identify CLEC-impacting changes or to address an unexpected CLEC-impacting change.

It appears that Qwest's proposed CMP addresses this by creating four categories of severity levels, whereby the impact of the loss of functionality is assessed, documented, and ranked for correction. See Qwest's CMP at § 11.5.

7. The Proper Meeting(s) at Which to Address a CR that Impacts Both an OSS Interface and Process

This issue is not addressed in the CMP sections of the FCC's orders, Verizon's CMP, or SBC's CMP. Qwest and the CLECs have been addressing this issue, though it has not been resolved. See CMP Issues Log (OPEN) # 163. The current version of the CMP contains a provision for a CLEC to introduce a product/process CR by emailing a CR form to Qwest's Product/Process CMP Manager and the CR is then handled through the CMP process. Qwest's CMP § 3.3.

8. CMP Product/Process Issues; Reliance on SGATs; Impact of PCATs

The CMP sections of the FCC's orders do not address reliance on SGATs, references to PCATs, changes to SGATs through PCATs, or Product/Process issues. Part of Issue #9, and much of CMP Gap Analysis ##20-22, 114, references the "notice and go" process used by Qwest to unilaterally impose product/process changes on the CLECs. Although the CMP sections of the FCC's orders address the unilateral imposition of changes, *the FCC's orders have been limited to a discussion of changes to the OSS and have not addressed product/process changes*. Accordingly, to the extent that a change is to a product/process only and does not require a change to the OSS, the FCC's orders are silent and therefore appear to be inapplicable. However, to the extent that a product/process change impacts the OSS and requires a change to the OSS, the FCC's

orders would be applicable and dispositive. The FCC's provisions for changes that impact the OSS are discussed in the following paragraphs.

Issues related to the unilateral imposition of changes are addressed by the FCC's CMP requirements for CLEC's Input and Participation in the CMP. Although nothing in the FCC orders directly discusses changes to SGATs through PCATs, *to the extent that these changes do indeed impact the CLECs and require them to make changes to the OSS*, the SGAT changes would appear to be subject to the CMP. Therefore, the CLECs must have substantial input into the proposed changes before they are implemented. *To the extent that it impacts on OSS*, Qwest's "notice and go" process is insufficient under the FCC's CMP regime.

A CMP Agreement should address the processes for the five most common categories of changes, including changes initiated by the BOC. NY Order at ¶105; TX Order at ¶110; MA Order at ¶104. A key component of the FCC's CMP requirements for these processes is that the CLECs must have substantial and continuing input and participation regarding the design and ongoing operation of the CMP, including for proposed changes. NY Order at ¶106; TX Order at ¶111. Not only must the CLECs have input in the design of the CMP Agreement, but they must also "continue to participate meaningfully in its operation." MA Order at ¶107. Thus, the CMP should include provisions for (1) joint development of a schedule for the distribution of draft specifications, receipt of a competitor's comments, and distribution of final documents based on consensus; (2) a forum for discussion, including monthly meetings; (3) priority, reached by consensus, based on merit rather than on the identity of the sponsor of the change; (4) a requirement that the BOC provide the competitors with a plan outlining future modifications for the next year; and (5) a "go/no go" vote. NY Order at ¶106; TX Order at ¶¶111, 112, 116. During the meetings, the BOC and the CLECs should develop and maintain a detailed chart of CLEC's requests for action on certain CMP issues, track the status of the problems, and note the BOC's actions to address the issues. NY Order at ¶124. The BOC must respond to a CLEC's concerns in a timely and effective manner. TX Order at ¶123.

Further, except for emergency changes, which require only advance notification, and regulatory changes which must be implemented despite objections, all OSS-related changes should be implemented only after consensus has been reached. NY Order at ¶116; TX Order at ¶111. This concept is implemented by the inclusion of a provision for a "go/no go" vote (covered in Qwest's Prioritization process and including the "Sizing" meeting), a process which permits CLECs to decide whether or not to implement a new release and any CLEC that will be adversely affected by the implementation of a release to request that it be delayed." TX Order at ¶¶111, 112, 116. The "go/no go" procedure should include "a process for identifying and resolving issues related to the [CMP] in a timely manner." TX Order at ¶112.

Based on the foregoing requirements, changes should be implemented only after substantial input and feedback from the CLECs and, except for emergency and regulatory changes, only after consensus has been reached. NY Order at ¶¶106, 116; TX Order at ¶111.

The product/process issues are not addressed in either Verizon's CMP or SBC's CMP. While these issues have begun to be addressed in Qwest's CMP, there are still substantial areas of disagreement.

9. Process to Manage Changes to Performance Reporting Calculations; Overlaps Between CMP Redesign and CPAP-Like Procedures

The FCC's orders address the concept of metrics, a methodology for reporting compliance with various requirements including the time intervals for notification, documentation, and implementation of a change. NY Order at ¶113; MA Order at ¶105. However, the orders do not directly address changes to the performance reporting calculations or whether a process is required to manage such changes. The issues related to the overlap between the CMP Redesign and CPAP-like procedures are likewise not addressed in the CMP sections of the FCC's orders.

These issues are not addressed in either Verizon's CMP or SBC's CMP. Although these precise issues have not yet been addressed by Qwest's CMP, and in fact have been identified as a possible future impasse item, the CMP suggests that the parties contemplate a process (not drafted as of the March 7, 2002 CMP) for changes to the actual CMP itself. See Qwest's CMP §§ 1.0, 7.4

10. Necessity of a Process for Addressing a Non-Coding Change

This issue is not addressed in the CMP sections of the FCC's orders, as the FCC's orders do not distinguish between coding and non-coding changes. Rather, the FCC's orders distinguish changes based on the source or impetus of the change. Thus, the FCC has divided changes into five categories: (1) emergency changes; (2) regulatory changes; (3) changes in industry standards; (4) changes initiated by the BOC; and (5) changes requested by a competitor. TX Order at ¶110; MA Order at ¶104. Accordingly, the FCC's orders do not appear to require a CMP to include a process to specifically address non-coding changes.

This issue is not addressed in either Verizon's CMP or SBC's CMP. Although the CMP Issues Log indicates that Qwest is prepared to discuss and close this issue, it has not been closed or addressed in Qwest's CMP as of the publication of this report. See CMP Issues Log #137; Qwest's CMP.

CMP's Role in Rate Changes or Rate "Validation"

This issue is not addressed in the CMP sections of the FCC's orders, in Verizon's CMP, or in SBC's CMP. This has not yet been addressed in detail in Qwest's CMP Redesign.

5.2.2 Issues Conceptually Agreed Upon

There are still many issues to be agreed upon by the CMP Re-design team in the next several months. During the CMP Re-design meetings held March 5-7, 2002 the re-design team reached conceptual agreement on several issues identified by AT&T in **AT&T'S LIST OF PRIORITY CMP ISSUES** filed with the Arizona Corporation Commission on March 5, 2002. These issues are reflected in the following table.

Issues Parties Agreed on Conceptually	
<u>Criteria to determine method of implementing regulatory changes</u>	
-	Agreement must be reached at monthly Systems CMP meeting by Qwest and CLECs that a change request constitutes a Regulatory change.

Issues Parties Agreed on Conceptually
<ul style="list-style-type: none"> - General rule is Qwest shall implement a mechanized solution for a Regulatory change, unless all parties agree otherwise. - At this meeting Qwest is to propose implementation plan for compliance and provide cost analysis to include a description of the work to be performed and any estimates Qwest has performed for both manual and mechanized solutions. - A Regulatory change request will implemented by a manual solution in one of the following exceptions exists: <ul style="list-style-type: none"> a) mechanized solution is not technically feasible b) there is significant difference in the costs for manual and mechanized. - The parties in attendance at the CMP meeting will vote whether Exception A or B apply - Any party that disagrees with the majority decision may initiate the dispute resolution process under the CMP. The majority decision will apply unless the outcome of a dispute alters such decision.
<p><u>Provide a decision on whether to provide copies of Qwest documentation regarding prioritization and sizing. This issue includes completion of the prioritization process within CMP.</u></p> <ul style="list-style-type: none"> - Qwest's Position: No internal documentation (e.g., methods and procedures) will be shared with CLECs regarding procedures such as prioritization and sizing. - Consensus on concept. The Redesign team agreed in principle to the prioritization process for OSS Interfaces and the Special Change Request Process (SCRP). <p>CLECs and Qwest may prioritize CLEC-initiated change requests. In addition, parties may prioritize Industry Guideline and Regulatory change requests if it is determined that the changes can be implemented in more than one release and still meet the mandate or recommended implementation date.</p> <p>If a change request is ranked low, a party may choose to fully fund the implementation of that change by using the SCRCP. SCRCP changes will be included in the release for the affected OSS Interface.</p>
<p><u>What is the status of a change when the escalation or dispute resolution is invoked? Embedded within this issue is the imbalance in treatment that CLEC CRs receive versus Qwest CRs?</u></p> <p>Consensus on concept. The Redesign team agreed in principle to the following:</p> <ul style="list-style-type: none"> - If a CLEC invokes the dispute resolution process on a Qwest-initiated Product/Process change and requests that implementation is delayed as part of the dispute resolution process, Qwest will delay implementation for 30 days. - A private arbitrator may be used to determine whether Qwest must delay implementation of the change pending the determination of the CLEC's request for delay as part of the dispute resolution process. - Losing party pays the costs of the arbitrator. (CLECs asked whether an arbitrator provided by a state Commission would be considered to resolve a disputed issue. Qwest agreed to consider the issue and investigate further applicable state rules and procedures.) <p>Potential deal breaker. CLECs are concerned that the availability of a delay in implementation is limited to Product/Process changes that Qwest is required to initiate by submitting a change request. Qwest proposed four levels for a product/process change.</p>

Issues Parties Agreed on Conceptually	
<ul style="list-style-type: none"> - Level 1 changes are defined as changes that do not alter CLEC operating procedures or are time critical corrections. No change request will be initiated. - Level 2 changes have minimal effect on CLEC operating procedures. No change request will be initiated. - Level 3 changes have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 type of changes. No change request will be initiated. - Level 4 changes have a major effect on existing CLEC operating procedures or require the development of new procedures. A change request will be initiated. 	
<p>CLECs are requesting that Levels 3 and 4 be combined and that they require Qwest to submit a change request. This issue will be resolved when the parties discuss the process for Qwest-initiated Product/Process changes.</p>	

5.2.3 Qwest Process Improvements and Implementation Dates

To date there are numerous issues the CMP Redesign team has reached agreement on and Qwest has implemented or begun to implement these processes. The following table reflects the improvements and implementation dates as of February 15, 2002 as stated in Qwest's **Exhibit B CHANGE MANAGEMENT PROCESS IMPROVEMENTS 11-26-01 REVISED 2-15-02.DOC**.

Improvement	Implementation Date(s)
Standard Naming Convention	August 2001
Web Site Improvements - Design	October 2001
Customer Notification Letter Archive – Searchable website database	January 2002
CMP Process Improvements - CR Clarification Meetings - Meeting Distribution Package - Meeting Minutes - CR Tracking and Reporting Database - CR Project Management	August – November 2001
Escalation and Dispute Resolution Process Redesign Improvements - Process - Web Site	November 2001
Interim Exception Process	September 2001
OSS Interface 12 Month Development View	November 2001
CLEC/Qwest Initiated OSS Interface CR Process Redesign Improvements - Process - Form	October – November 2001

Improvement	Implementation Date(s)
CLEC Initiated Product and Process CR Process Redesign Improvements <ul style="list-style-type: none"> - Process - Form 	October – November 2001
PCAT Red-Line	Started November 2001
Tech-Pub Red-Line	Started October 2001
Point of Contact List	October 2001
Established CMP Full Day Meetings	October 2001
Prioritization of Qwest Originated OSS Interface CRs	August – November 2001 Language scheduled to be completed in Redesign in February 2002
Introduction of New OSS Interface	Ready when applicable
Web Tool to Support CLEC Comments	November 2001
Retirement of OSS Interface	Ready when applicable
Changes to an Existing OSS Application to Application Interface <ul style="list-style-type: none"> - Draft Technical Specifications Walkthrough - CLEC Comment Cycle - Final Technical Specifications - CLEC Testing 	Effective with IMA 10.0 Release
Changes to an Existing GUI <ul style="list-style-type: none"> - Draft User Guide - CLEC Comment Cycle - Final User Guide 	Effective with IMA 10.0 Release
OSS IMA EDI Versioning	In Effect
Interface Testing Environment <ul style="list-style-type: none"> - SATE 	SATE Available with IMA 9.0 Master Redline language agreed to February 5-7 Redesign
Production Support	Implemented February 2002
Technical Escalation Process	Process agreed to in Redesign February 5-7

6 SUMMARY AND CONCLUSION

As previously mentioned, within the scope of CGE&Y's Arizona §271 OSS test and the narrow purview of the Arizona TSD, Qwest's previous process already satisfied most objectives. Realizing the process had some shortcomings, CGE&Y issued IWOs to address what CGE&Y believed to be the root cause of these shortcomings.

The principal IWO addressing the root cause of the CMP deficiencies was AZIWO1075-1, which dealt with the non-collaborative nature of the entire process. The basis of this IWO was not that the CLECs lacked the ability to request changes to Qwest's OSS (TSD objective 6.1.1.3 [d]), but that the CLECs only had the ability to discuss, prioritize, and vote on *Qwest-originated* changes to Qwest's OSS. The IWO pointed out that CLEC-originated CRs statistically have made up a small percentage of overall CRs included in systems releases since the CMP was established, and that CLECs had virtually no insight into Qwest's own internal development efforts whatsoever.

The redesigned process, even though only in interim form, has already taken a major step toward addressing this deficiency. As previously mentioned, Qwest-originated CRs were included in the list of CRs for CLEC/Qwest prioritization for IMA release 10.0. The process was not perfect. Qwest put forth a number of CRs that it viewed as Regulatory and thus exempt from the prioritization process; the CLECs objected. Eventually, clarification meetings were convened and the list of Regulatory CRs being presented by Qwest was shortened considerably. The fact that this process worked as it did, demonstrates that CLECs now have an ability to discuss, prioritize and vote on CLEC-originated changes, which – as noted above – was the deficiency cited in AZIWO1075-1.

The second IWO CGE&Y issued, AZIWO1076-1, related to the length of time it took CRs to make it through the process even as far as the prioritization stage. Qwest already took steps toward addressing this IWO before the redesign effort was initiated. A separate Product/Process CMP was created, an overall Director of Change Management was hired and given the requisite authority with which to direct Qwest resources related to systems or other changes, emphasis was placed on better attendance of meetings by Qwest subject matter experts, and the CMP website and meeting materials were greatly improved. With the dramatic expansion of the CMP charter under the redesign process, it is difficult to say whether the CR lifecycle will continue to shorten or not, however CGE&Y feels that the improvements made thus far have been sufficient.

CGE&Y issued AZIWO1078 to address the length of time it took Qwest to provide CLECs with final EDI design documentation in advance of a release. In the past, final documentation had not been published to CLECs until less than a month prior to a release, giving them insufficient time to program their side of the interface to match Qwest's changes. The language in the Master Redline CMP Re-Design Framework document currently reads: "Qwest's planned implementation date will be at least 45 calendar days from the date of the final release requirement, unless the exception process has been invoked. Implementation timeline for the release will not begin until final specifications are provided." The soonest this could be implemented would be with IMA release 10.0, so CGE&Y has not had the opportunity to verify that the 45-day deadline will be met. It must be noted that 45 calendar days is in line with the industry norm.

Qwest's CMP is an important forum, perhaps the most important forum, for CLECs to bring OSS and product/process issues to Qwest's attention and to the attention of other CLECs, and to be able to ensure that Qwest continues to provide CLECs a meaningful opportunity to compete by fully communicating proposed changes to its OSS. The FCC has recognized this fact in other jurisdictions by outlining what it considers to be the basic requirements for a BOC's wholesale systems Change Management Process. For this reason the CLEC community is striving to redesign the CMP in a way that gives them the greatest possible input into the changes that affect its business.

In reaching conclusions regarding the state of Qwest's CMP redesign, CGE&Y had to rely on the most reliable standards available. Those standards, as described throughout this document, are:

- Change Management "Best Practices"
- The Arizona MTP and TSD
- The FCC requirements for Change Management
- Applicable State Orders where §271 approval has already been granted to the incumbent carrier

In various CLEC briefs and pleadings on the subject of the redesign of Qwest's CMP, CGE&Y has found that the standard being used to judge both the redesign process and the finished product is the totality of what the CLEC community wants from the process. This also appears to be the standard that is being applied in other tests underway in Qwest territory. Against such a standard, CGE&Y agrees that there is much work to be done and the process is far from meeting CLEC needs.

CGE&Y believes that this is an unreasonable standard to apply. CGE&Y has applied more reasonable standards that, moreover, have been approved and tested in other jurisdictions. Ultimately, it will be for the ACC to decide which of the two standards will prevail in this proceeding.

CGE&Y makes the following points regarding the CMP redesign effort:

- It is a collaborative process with both sides provided ample opportunity to present ideas
- The effort still has a few months of work left, but acceptable progress is made at each redesign meeting
- The redesign meetings themselves are amply attended by subject matter experts from Qwest
- The CMP as it exists today already is sufficient to address the deficiencies highlighted in AZIWO1075-1, AZIWO1076-1, and AZIWO1078
- In encompassing changes to products and processes, the Qwest CMP exceeds the objectives set forth by the Arizona MTP and TSD, the various State Orders, and the FCC requirements for Change Management

APPENDIX A – GLOSSARY

Abbreviation	Description
ACC	Arizona Corporation Commission
ATIS	Alliance for Telecommunications Industry Solutions
BOC	Bell Operating Company
CGE&Y	Cap Gemini Telecom Media and Networks U.S., Inc.
CICMP	Co-Provider Industry Change Management Process
CLEC	Competitive Local Exchange Carrier
CMP	Change Management Process
CR	Change Request
DOD	Department of Defense
EDI	Electronic Data Interchange
FCC	Federal Communications Commission
GUI	Graphical User Interface
IMA	Interconnected Mediated Access
IWO	Incident Work Order
LEC	Local Exchange Carrier
LOE	Level of Effort
MTP	Master Test Plan
OBF	Ordering and Billing Forum
OSS	Operations Support Systems
PAP	Performance Assurance Plan
PID	Performance Indicator Definitions
POC	Point of Contact
SATE	Stand Alone Test Environment
SBC	Southwest Bell Corporation
TSD	Test Standards Document

PROFESSIONS AND SERVICE LINES - GLOBAL DELIVERY

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